

MARK GORTON (SBN 99312)  
**BOUTIN JONES INC.**  
 555 Capitol Mall, Fifteenth Floor  
 Sacramento, CA 95814  
 Telephone: (916) 321-4444  
 Email: [mgorton@boutinjones.com](mailto:mgorton@boutinjones.com)

LISA S. GAST (*pro hac vice*)  
**DUNCAN, WEINBERG, GENZER & PEMBROKE, P.C.**  
 1667 K Street NW, Suite 700  
 Washington, DC 20006  
 Telephone: (202) 791-3601  
 Email: [lsg@dwgp.com](mailto:lsg@dwgp.com)

BRIAN DOYLE (SBN 112923)  
 City Attorney  
**CITY OF SANTA CLARA**  
 1500 Warburton Avenue  
 Santa Clara, CA 95050  
 (508) 615-2234  
[BDoyle@SantaClaraCA.gov](mailto:BDoyle@SantaClaraCA.gov)

*Attorney for Creditor and Party-in-Interest*  
**CITY OF SANTA CLARA dba SILICON VALLEY POWER**

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re	)	Case Nos. 19-30088 DM (Lead Case)
	)	19-30089 DM
PG&E CORPORATION	)	Chapter 11
-and-	)	Jointly Administered
PACIFIC GAS AND ELECTRIC	)	
COMPANY,	)	<b>REQUEST FOR JUDICIAL NOTICE IN</b>
Debtors.	)	<b>SUPPORT OF OBJECTION TO CURE</b>
	)	<b>AMOUNT AND REQUEST FOR</b>
<input type="checkbox"/> Affects PG&E Corporation	)	<b>ADEQUATE ASSURANCE OF FUTURE</b>
<input type="checkbox"/> Affects Pacific Gas and Electric Company	)	<b>PERFORMANCE BY COUNTERPARTY</b>
<input checked="" type="checkbox"/> Affects both Debtors.	)	<b>CITY OF SANTA CLARA DBA SILICON</b>
	)	<b>VALLEY POWER</b>
* All papers shall be filed in the Lead Case	)	Date: May 27, 2020
No. 19-30088 DM	)	Time: 10:00 a.m.
	)	Courtroom: 17
	)	Place: 450 Golden Gate Ave., 16 <sup>th</sup> Floor
	)	San Francisco, CA 94102
	)	Judge: Hon. Dennis Montali

1 The City of Santa Clara dba Silicon Valley Power ("Santa Clara"), in support of its Objection  
2 to Cure Amount and pursuant to Federal Rule of Evidence 201, as made applicable in bankruptcy  
3 court by Federal Rule of Evidence 1101 and to this case by Federal Rule of Bankruptcy Procedure  
4 9017, hereby requests the Court to take judicial notice of the following facts:

- 5 1. Attached as **Exhibit 1** is a true and correct copy of Grizzly Development and  
6 Mokelumne Settlement Agreement ("GDMSA") between Pacific Gas and Electric  
7 Company and the City of Santa Clara, entered into on March 8, 1990, and most  
8 recently filed by PG&E at the Federal Energy Regulatory Commission ("FERC") as a  
9 stand-alone agreement in FERC Docket No. ER17-1752-000, effective  
10 August 1, 2017.
- 11 2. Attached as **Exhibit 2** is a true and correct copy of the referenced pages of the  
12 PG&E/Santa Clara Final License Application for Bucks Creek Hydroelectric Project,  
13 FERC Project No. 619 (FERC filed Dec. 12, 2016) at Volume I, Exhibit A, Pages A-  
14 1, A-13 - A-20 (FERC filed Dec. 12, 2016) and the complete application can be found  
15 at <http://www.bucksrelicensing.com/Public/default.aspx>.
- 16 3. Attached as **Exhibit 3** is a true and correct copy of a FERC Order in which FERC  
17 notes that PG&E and Santa Clara agree that the first reverter date is in November  
18 2027 filed in *Public Utilities With Existing Contracts in the California Independent*  
19 *System Operator Corporation Region*, 112 FERC ¶61,007 (2005).
- 20 4. Attached as **Exhibit 4** is a true and correct copy of Cal Fire News Release, "Cal Fire  
21 Investigators Determine Cause of Camp Fire," May 15, 2019, which can also be  
22 found at [https://www.fire.ca.gov/media/5121/campfire\\_cause.pdf](https://www.fire.ca.gov/media/5121/campfire_cause.pdf).
- 23 5. Attached as **Exhibit 5** is a true and correct copy of PG&E December 11, 2018  
24 Supplement to the California Public Utilities Commission regarding Electric Incident  
25 Report Nos. EI181108A and EI181108B, which can also be found at  
26 <http://dig.abclocal.go.com/kgo/PDF/121118-pge-camp-fire-letter-to-cpuc.pdf>.
- 27 6. Attached as **Exhibit 6** is a true and correct copy of PG&E Response to Request for  
28 Information, *United States of America v. Pacific Gas and Electric Company*, Case

3:14-cr-00175-WHA, Docket 1078 (N.D.Cal., filed July 31, 2019).

7. Attached as **Exhibit 7** is a true and correct copy of Order Modifying Conditions of Probation, *United States of America v. Pacific Gas and Electric Company*, Case 3:14-cr-00175-WHA, Docket 1186 (N.D.Cal., filed April 29, 2020).

DATED: May 15, 2020.

RESPECTFULLY SUBMITTED,

BOUTIN JONES INC.

By: /s/ Mark Gorton  
Mark Gorton

-and-

Lisa S. Gast  
DUNCAN, WEINBERG, GENZER & PEMBROKE,  
P.C.

-and-

Brian Doyle  
City Attorney  
CITY OF SANTA CLARA

*Attorneys for Creditor and Party-in-Interest,*  
*CITY OF SANTA CLARA dba SILICON VALLEY*  
*POWER*